



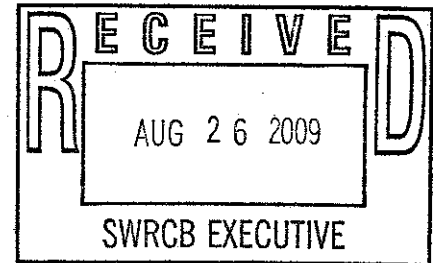
DEPARTMENT OF THE ARMY
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, US ARMY GARRISON, PRESIDIO OF MONTEREY
1759 LEWIS ROAD, SUITE 210
MONTEREY, CA 93944-3223

REPLY TO
ATTENTION OF

26 August 2009

Garrison Headquarters

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Subject: United States Army Garrison, Presidio of Monterey Comments Regarding the Draft Cease and Desist Order WR 2009-00XX, In the Matter of the Unauthorized Diversion and Use of Water by the California American Water Company

Dear Ms. Townsend,

I am submitting this letter on behalf of the United States Army Garrison, Presidio of Monterey to express my concerns regarding the draft Cease and Desist Order (CDO), dated July 27, 2009, regarding California American Water Company's (Cal Am) unauthorized diversion of water from the Carmel River.

The proposed CDO will impede the Defense Language Institute Foreign Language Center's (DLIFLC) ability to carry out the construction projects required to accommodate its expanding mission. The draft order should be modified to exempt all military construction projects connected to the Presidio of Monterey and DLIFLC from any moratorium on new service connections and increased use at existing service addresses. This exemption is required to avoid any adverse impact on national security.

Background:

The Presidio of Monterey is home to the Defense Language Institute Foreign Language Center (DLIFLC), the only dedicated language training facility in the Department of Defense and the largest institution of its kind in the United States. The primary mission of the DLIFLC is to provide culturally-based foreign language education, training, evaluation, and sustainment for Department of Defense (DoD) personnel to ensure the success of the Defense Language Program and enhance the security of the nation. The linguists trained here are a vital component of our national security and are essential to the successful prosecution of our contingency operations, not only in Iraq and Afghanistan, but throughout the world. Because of the importance and value of the training provided by DLIFLC, the Department of Defense has mandated the expansion of

DLIFLC's capacity. The demand for trained military linguists is high and will remain so for the foreseeable future.

The potable water distribution system at the Presidio of Monterey is a privatized system operated and maintained by California American Water Company. Water is supplied through three major supply points: at Taylor Gate, near Pvt. Bolio Gate, and near Hilltop Field. There are three potable pumping stations and 1.1 million gallons of potable water storage capacity on the Presidio of Monterey.

The Presidio of Monterey works continuously with the Monterey Peninsula Water Management District and California American Water Company to reduce water usage throughout the installation. We have used waterless urinals, water saving devices in the dining facilities, artificial grass sports field, and native plants (with limited establishment irrigation) in efforts to reduce water usage. Our efforts have resulted in a reduction of usage of 301 acre-feet in fiscal year (FY) 1998 to a usage of 204 acre-feet in FY 2008. We have used the credits generated by these measures to support the construction of new facilities.

There is no direct allocation of water provided to the installation to measure our direct relationship to the water taken from the Carmel River. The Presidio of Monterey is almost completely contained within the City of Monterey boundaries and receives its water allocation from the city as managed by the Monterey Peninsula Water Management District. Although the CDO does not apply to the Presidio directly, the restrictions in the draft order may have the second order effect of preventing DLIFLC and the Presidio from carrying out necessary construction projects and upgrades to the base. These projects are vital to national security because they will enable DLIFLC to meet its expanding mission.

Short Term Effects (2009 - 2014):

The Presidio of Monterey has a number of Military Construction, Army (MCA) projects in the Future Years Defense Plan that could be affected by the draft Cease and Desist Order against the California American Water Company. These include the FY08 General Instruction Building (under construction) and the FY09 General Instruction Building (forecast for award in December 2009). These two projects are already permitted by the Monterey Peninsula Water Management District (MPWMD) based on water saved by using waterless urinals throughout the installation and water saving dining facility technology. We will apply for a water permit for a FY11 General Instruction Building that will be based on credits resulting from the demolition of 50 apartment units (September 2009) on the installation. Also affected are the FY11 Barracks Phase I project and the FY13 Barracks Phase IV projects. The FY11 Barracks Phase I project requires a net additional 5.03 acre-feet of water and involves the construction of a modern barracks building, modern dining facility, modern administrative facility, and the demolition of a 1950s era barracks facility. The FY13 Barracks Phase IV project will construct an additional 400 personnel barracks facility requiring an additional 8.00 acre-feet of water.

These facilities are required to implement the DLIFLC's Proficiency Enhancement Program (PEP) to meet higher language standards, the increased number of language students, and a higher standard of living for our service members demanded by the various services and the

nation's intelligence community. Failure to construct these facilities identified will adversely affect the DLIFLC's ability to graduate the number and quality of language students required by the nation.

Furthermore, the financial loss to the local economy will be significant if we are unable to complete these buildings. The projects represent a planned investment of over \$220 million into the installation and the local economy. The increased capacity will provide an additional economic benefit because it will allow the accommodation of more servicemembers who will provide additional revenue to the local economics.

Long Term Effects (2015 - 2025):

Failure to construct the short term Military Construction, Army (MCA) projects will have a ripple effect for the follow-on long term projects identified in the installation Future Development Plan to eliminate off-post leases, correct security issues, gain efficiencies, and replace the use of antiquated facilities for language training. It will also call into question the future viability of the Presidio of Monterey as the home of the Defense Language Institute Foreign Language Center if the installation is limited to the number of students it can graduate. Facility limitations could result in possible relocation of portions or all of the DLIFLC to meet the increasing need for high quality foreign language students. This in turn may have an adverse economic impact on the local community as the Presidio of Monterey has a total economic impact of \$638 million in salaries (military and civilian) and a variety of service and construction contracts.

Conclusion:

Recommend that the order in its final form specifically exempt the Presidio of Monterey and DLIFLC. Although the order does not pertain to the Department of the Army it will affect Cal Am's ability to service our future projects that are vital to national security.



Darcy A. Brewer
Colonel, U.S. Army
Commanding